

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

JOHN DOE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No: 1:19-cv-00013-JL
	)	
TRUSTEES OF DARTMOUTH COLLEGE,	)	
	)	
Defendant.	)	
	)	

**JOINT STATEMENT REGARDING STATUS OF DISCOVERY**

NOW COME the parties, John Doe and Trustees of Dartmouth College, by and through counsel, submitting a Joint Statement Regarding Status of Discovery, and, in support thereof, state as follows:

1. In response to the Court's September 3, 2019 Order, Defendant produced additional discovery in compliance with the Order. Similarly, Sally Smith produced additional discovery in compliance with the Order. These productions were completed in October 2019.

2. Pursuant to the Order, a significant amount of documents were produced on an Attorneys Eyes Only basis. Many of these documents will be relevant to discovery moving forward and Plaintiff will request guidance from the Court at the November 15, 2019 status conference regarding use of these documents during discovery and/or the potential removal of the Attorneys Eyes Only designation.

3. No depositions have been conducted in the case to date.<sup>1</sup>

4. Plaintiff made his expert disclosures on November 1, 2019. The parties agree that Defendant's expert disclosures may be made by January 15, 2020.

5. The parties request an extension of the discovery deadline to March 31, 2020. This will allow the parties to take depositions of fact and expert witnesses and supplement any document discovery as necessary. Additionally, counsel have considered their trial schedules and the schedules of likely deponents who are students or college administrators who will be unavailable for deposition in late 2019 and early 2020 due to the holiday semester break. The parties believe all remaining discovery will be completed by this date.

6. The parties request a summary judgment deadline of April 15, 2020.

7. The parties anticipate requesting a trial date in late 2020.

Respectfully submitted,

JOHN DOE

Date: November 7, 2019

/s/ William E. Christie

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<sup>1</sup> Depositions have not been conducted for mainly three reasons: 1) an injury to Plaintiff's counsel which kept him on limited duty during the summer of 2019; 2) resolution of discovery issues resulting in the September 3, 2019; and 3) counsel's trial schedule in other matters.

TRUSTEES OF DARTMOUTH COLLEGE,

Date: November 7, 2019

/s/ Daryl J. Lapp

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